IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

ASSOCIATE DIVISION

THE HONORABLE JUDGE CARRIER

DIVISION 26

FILED
JUN 10 2026
CIRCUIT CLERK
GREENE COUNTY

GHAN & COOPER MULTIFAMILY, LLC,

Plaintiff,

v. **Case No. 2631-AC01381**

DIDI LYNN BLACKWELL,

Defendant.

MOTION FOR RECONSIDERATION OF DENIAL OF IN FORMA PAUPERIS STATUS

Comes now Defendant, Didi Blackwell, Pro Se, and respectfully moves this Court to reconsider its June 4, 2026 denial of Defendant's Application to Proceed In Forma Pauperis, originally filed on April 14, 2026. In support of this Motion, Defendant states as follows:

1. The underlying case began with improper and defective service of process. Defendant was never personally served under Missouri Supreme Court Rules. Service was left in Defendant's apartment mailbox and later taped to the door. The return of service was completed after the fact and contains false information. Defendant raised these defects repeatedly, yet the Court did not address or correct them.

2. Defendant's co-signer, an active county deputy and a party to the lease, was never served at any stage of the proceedings. At the final hearing, the co-signer personally informed the Court that he had never been served. The Court declined to address this issue or reissue proper service.

3. The Writ of Execution used to remove Defendant from the property did not match or reflect the judge's actual ruling. Despite Defendant informing the executing deputy that the writ contained fraudulent and inconsistent documents, the deputy proceeded with execution. Defendant was wrongfully removed from the residence based on a defective writ.

4. Defendant's displacement was further caused by uninhabitable environmental toxin exposure at the rental property, including conditions that posed immediate danger to health and safety. These conditions were documented prior to the eviction and remain unresolved.

5. As a result of the wrongful eviction and environmental hazards, Defendant has been homeless since April 23, 2026 and has been residing in a vehicle that was purchased before these proceedings through a lienholder, and which Defendant does not own outright or have the ability to sell or refinance. The vehicle is being used solely as a temporary shelter due to the wrongful eviction. Defendant has no stable housing, no utilities, and no ability to maintain normal living conditions.

6. Defendant's two Emotional Support Animals (ESAs) were displaced by the eviction and environmental conditions. They have been in continuous emergency boarding at a licensed veterinary facility since February 6, 2026. Defendant is personally responsible for all boarding costs and is paying solely from federal SSI benefits.

7. Defendant's only source of income is Supplemental Security Income (SSI). Verification is attached. Under federal and state law, SSI benefits are exempt from garnishment, levy, or diversion and are intended solely for basic subsistence. It is a legal and physical impossibility for Defendant to pay filing fees without deprivation of food, shelter, and essential survival needs.

8. Defendant has no reliable or ongoing financial support. The previous co-signer, who is obligated under a prior notarized agreement, withheld required payments for approximately five months and has refused to enter into any new agreement. Any recent funds received were sporadic, unpredictable, and limited to partial reimbursement for overdue vehicle repair obligations under that prior contract. These irregular payments cannot be relied upon, do not constitute income or support, and have not prevented Defendant's homelessness or financial hardship.

9. Defendant further notes that the Circuit Clerk's office has repeatedly declined to provide procedural timelines or access to appeal-related documentation following the June 4th order, despite Defendant's good-faith attempts to comply with all filing requirements. These barriers have materially affected Defendant's ability to proceed.

10. Missouri courts grant In Forma Pauperis status when payment of fees would result in substantial hardship or deprive the applicant of basic necessities. Defendant's current circumstances meet and exceed this standard.

WHEREFORE, Defendant respectfully requests that this Court:

A. Vacate its June 4, 2026 denial of the Application to Proceed In Forma Pauperis;

B. Grant Defendant's Application based on the updated and documented circumstances; and

C. Advance the previously filed Application for Trial de Novo to the docket upon approval.

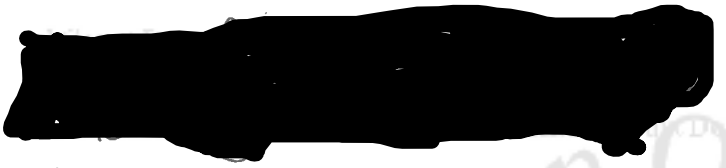
Respectfully submitted,

Didi Lynn Blackwell

[Currently Homeless]

VERIFICATION

I, Didi Lynn Blackwell, being of lawful age and duly sworn upon my oath, state that I have read the foregoing Motion for Reconsideration of Denial of In Forma Pauperis Status, and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.



Didi Lynn Blackwell

STATE OF MISSOURI

ss.

COUNTY OF Greene

Subscribed and sworn to before me this 9 **day of** June **, 2026.**

Sandra Luise Marcil

Notary Public

SANDRA LUISE MARCIL
Notary Public - Notary Seal
STATE OF MISSOURI
Greene County
My Commission Expires Sept. 22, 2028
Commission #24095231

My Commission Expires: Sept. 22, 2028

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